

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

SHANIECE STEELE

Plaintiff,

v.

SHARKNINJA OPERATING, LLC,

Defendant.

CASE NO. 3:24-cv-05349-JHC

**STIPULATION AND ORDER
EXTENDING DISCOVERY**

Note on Motion Calendar: 01/08/2025

Plaintiff Shaniece Steele and Defendant SharkNinja Operating, LLC (“SharkNinja”) (collectively, the “Parties”) enter into this stipulation with reference to the following facts and recitals:

On May 14, 2024, Plaintiff served her Complaint on SharkNinja.

The FRCP 26(f) conference took place on July 8, 2024.

Pursuant to this Court’s Order (ECF 10), deadlines related to discovery in this case are as follows:

- **Feb. 4, 2025.** Disclosure of expert testimony under FRCP 26(a)(2)
- **Mar. 6, 2025.** Motions related to discovery due.
- **Apr. 7, 2025.** Discovery completion deadline.

The Parties have exchanged written discovery and are actively working to schedule an inspection of the at-issue product, as well as fact witness depositions.

Given the conflicting schedules of counsel and the experts involved, including trials and inspections for other litigation matters, the Parties have been unable to schedule a date for the inspection of the product. In addition, SharkNinja's anticipated expert witness is in fact transitioning between employers and will be briefly delayed (until mid-January) in his ability to inspect the product. Inspection of the product will be important for the preparation of expert reports under FRCP 26(a)(2). And because the condition of the product (which will be disclosed at inspection) is a potential topic for Plaintiff's deposition, SharkNinja has not yet noticed Plaintiff's deposition.

Moreover, Plaintiff has requested through discovery documents from SharkNinja that may impact the opinions of the expert witnesses in this case. SharkNinja is actively preparing those documents for production, and intends to produce said documents shortly, but the production has not yet occurred.

Given these circumstances, the Parties agree to extend the deadlines for discovery as follows:

| Event | Original Date | Proposed Date |
|--------------------------------|---------------|----------------------------------|
| Disclosure of Expert Testimony | Feb. 4, 2025 | March 7, 2025 (Initial Reports) |
| | NA | April 7, 2025 (Rebuttal Reports) |
| Motions Related to Discovery | March 6, 2025 | March 27, 2025 |
| Discovery Completed By | April 7, 2025 | April 18, 2025 |

Modifying these deadlines will not impact the remaining dates set forth in this Court's initial scheduling order; it does not impact the dispositive motion deadlines or the trial date.

THEREFORE, THE PARTIES HEREBY STIPULATE, SUBJECT TO THIS THIS COURT'S APPROVAL, TO THE ENTRY OF AN ORDER MODIFYING THE SCHEDULING ORDER AS SET OUT ABOVE, SETTING THE PROPOSED DATE AS THE RELEVANT DEADLINE FOR THE SPECIFIED EVENT.

1 IT IS SO STIPULATED.

2 Dated: January 8, 2025

Respectfully submitted,

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Attorneys for Defendant

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: January 10, 2025

A handwritten signature in black ink, reading "John H. Chun". The signature is written in a cursive, flowing style. Below the signature is a solid horizontal line.

JOHN H. CHUN
United States District Judge